BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268–0001

ANNUAL COMPLIANCE REVIEW, 2017	Docket No. ACR2017

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-7 OF CHAIRMAN'S INFORMATION REQUEST NO. 16

The United States Postal Service hereby provides its responses to the above-

listed questions of Chairman's Information Request No. 16, issued on February 9, 2018.

Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1.   In the *FY 2017 Report*, the Postal Service states, "To avoid accidents and occupational diseases, we have adopted standard requirements for safety and health protection at the workplace." FY 2017 *Annual Report* at 18. Please provide the "standard requirements for safety and health protection" that the Postal Service has adopted in the workplace.

RESPONSE:

The "standard requirements for safety and health protection" are outlined in the Postal Service's Employee Labor Relations Manual (ELM).

The Postal Service™ is subject to Public Law Number 91–596, the Occupational Safety and Health (OSH) Act of 1970, 29 U.S.C. § 651 et seq., and Public Law Number 105-241, the Postal Employees Safety Enhancement Act (PESEA) of 1998, 39 U.S.C. § 101 note. The OSH Act provides for citations, penalties, and criminal referrals for those employers who fail to comply. The Occupational Safety and Health Administration (OSHA) is responsible for promulgating and enforcing standards and regulations under the OSH Act.

Management commitment, involvement, and accountability are key to ensuring a safe workplace. Managers must demonstrate a commitment to providing safe and healthful working conditions in all Postal Service-owned and -leased installations, become involved in day-to-day safety performance, and be held accountable for safety performance and compliance with OSHA standards and regulations.

The Vision Statement for the Postal Service's safety program is that the Postal Service will become a leader in occupational safety and health for the federal

government and private sector by demonstrating a commitment to integrating safe work practices into all of its services.

The guiding principles of the Postal Service Safety Program are:

- People — Employees are our most valued resource. Our employees must be provided a safe and healthful workplace.

- Customers — when our employees work more safely, our performance improves.

- Excellence — we can demonstrate that management and employee attention to working safely is good business.

- Integrity — as a leader in occupational safety and health, we enhance our integrity with our customers, business partners, and Congress.

- Community Responsibilities — when our employees work safely, our customers are safer, and we lead other employers by example.

The safety philosophy of the Postal Service is that any occupational injury or illness can be prevented. This goal is realistic, not theoretical. Supervisors and managers have primary responsibility for the well-being of employees and must fully accept this principle.

Management, which encompasses all levels including the first-line supervisor, is responsible and accountable for the prevention of accidents and control of resultant losses. Just as the line organization is responsible for attaining production levels, ensuring quality of performance, maintaining good employee relations, and operating

within cost and budget guidelines, supervisors and managers must likewise accept their share of responsibility for the safety and health of employees.

It is possible to safeguard against all operating exposures that can result in accidents, injuries, and illnesses. It is preferable to eliminate the sources of danger. However, where this is not practical, management must use protective measures, including:

- Administrative controls;
- Machine guards;
- Safety devices; and
- Personal protective equipment.

All employees must be trained in proper work procedures and must be educated to work safely and to understand that they are responsible for doing so. Management is responsible for the adequate safety training and education of employees. However, all employees are responsible for working safely, and in doing so, they benefit not only themselves, but also their organization.

It is good business practice in terms of efficiency and economy to prevent personal injuries on and off the job. Injuries cost money, reduce efficiency, and cause human suffering.

2. The Total Accident Rate result improved between FY 2016 and FY 2017. *See id.* at 14, 19. Please explain the reasons for this improvement.

RESPONSE:

The Total Accident Rate improvement between FY 2016 and FY 2017 can be attributed to a number of factors. At the beginning of the fiscal year, the Postal Service began shifting its reporting process to focus on leading indicators, such as hazard abatement, inspection, and joint safety committee meetings. This shift in focus created a more proactive approach in preventing accidents, rather than the reactive process of reporting accidents after the fact. In addition, the agency continued to stress the importance of the Counseling At Risk Employee (CARE) program as an opportunity to address safety concerns and train newer employees and accident repeaters. Another large impact program implemented in FY 2017 involved assigning EAS level employees to serve as Safety Ambassadors during the peak holiday season. This program gave employees a single point of contact for all safety concerns and resulted in a nearly 23 percent reduction in accidents over the holidays.

3. In response to a Chairman's Information Request (CHIR), the Postal Service provided Total Accident Rate results from FY 2014 through FY 2017.[1] These results differ slightly from those provided in the *FY 2017 Report*. *See* FY 2017 *Annual Report* at 14.

    a.   Please explain why Total Accident Rate results differ between the *FY 2017 Report* and Response to CHIR No. 9, question 8.

    b.   Please confirm or provide current Total Accident Rate results from FY 2014 through FY 2017. In the response, please explain whether these results are final numbers or whether these results will need to be revised or restated to reflect new claims or changes to existing claims.

RESPONSE:

a. The statistics reported in the initial FY 2017 Report represent the data captured as of September 30, 2017 for the end of year performance assessment. The response to CHIR No. 9 reflects any accidents that were reported after the data capture on September 30. These figures differ as a result of accidents entered later in time for incidents that occurred before September 30. As an example, an employee may not realize the need for medical treatment for a week or more after an incident. Once the employee obtains that treatment, he or she can retroactively submit an accident claim (up to three years later) for entitlement to benefits from the Office of Workers' Compensation Programs. As such, these numbers remain fluid and will show slight deviations from end of year reporting.

b. The data reported in CHIR No. 9 for Total Accidents remain unchanged from the last report. As stated above, the numbers may differ as more time passes between data capture efforts. Current Total Accident Rate results for FY 2014 through FY 2017 can be found in the table below.

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Total Accidents Corporate

Year	Expo Hrs	Total Accidents	Total Accidents Rate
FY 14	1,099,470,792	87670	15.95
FY 15	1,120,514,360	91108	16.26
FY 16	1,149,939,707	92465	16.08
FY 17	1,156,314,192	90051	15.58

4.   This question concerns how the Postal Service tracks accidents.

a.   Please confirm that the Postal Service has a database or tracking system that captures the number of accidents by employee or the number of times an employee has been involved in an accident. If confirmed, please describe how the database or tracking system works.

b.   If not confirmed, please explain whether it is feasible or desirable to track the number of accidents by employee or the number of times an employee has been involved in an accident.

RESPONSE:

a. Confirmed. The Postal Service is required by 29 CFR 1904, *Recording and Reporting Occupational Injuries and Illnesses,* to use the following forms (or equivalent forms) to record occupational injuries and illnesses:

- OSHA Form 300, *Log of Work-Related Injuries and Illnesses;*

- OSHA Form 300A, *Summary of Work-Related Injuries and Illnesses;* and

- OSHA Form 301, *Injury and Illness Incident Report*.

The Postal Service uses an accident reporting process — the Employee Health and Safety system (EHS) — to fulfill these requirements. PS Form 1769/301, *Accident Report,* generated by EHS, is equivalent to OSHA Form 301. The data from EHS is uploaded weekly to the Enterprise Data Warehouse (EDW) for reporting purposes.

b. Not applicable.

5.   In Response to CHIR No. 9, the Postal Service provided the total number of motor vehicle accidents for FYs 2014, 2015, 2016, and 2017. Responses to CHIR No. 9, question 9.a.i. Please provide the total number of non-motor vehicle accidents (accidents that did not involve motor vehicles) for FYs 2014, 2015, 2016, and 2017.

RESPONSE:

Fiscal Year	FY 2014	FY 2015	FY 2016	FY 2017
Non Motor Vehicle Accidents	67,055	67,907	67,139	64,740

6.   In Response to CHIR No. 9, the Postal Service provided the number of motor vehicle accidents in FY 2017 by cause code. *Id.*

    a.   One cause code is "500-MV-COLLSN/SIDESWIP VEHS IN MOTION."

        i.   Please explain what this cause code means and describe the types of motor vehicle accidents that would be included under this cause code.

        ii.   Please confirm that all accidents included under this cause code involved Postal Service vehicles that were moving when the accident occurred. If not confirmed, please explain.

    b.   Another cause code is "600-MV-COLLSN/SIDESWIP STAT VEH/OBJ."

        i.   Please explain what this cause code means and describe the types of motor vehicle accidents that would be included under this cause code.

        ii.   Please confirm that all accidents under this cause code involved Postal Service vehicles that were stationary or not moving when the accident occurred. If not confirmed, please explain.

RESPONSE:

a.i. Code 500 "Collsn/Sideswip Vehs in Motion" refers to motor vehicle accidents where the vehicle operator makes contact with another vehicle while both vehicles are in motion.

a.ii. Confirmed. Both vehicles were in motion for accidents coded using Code 500.

b.i. Code 600 "Collsn/Sideswip Stat Veh/Obj" refers to motor vehicle accidents where the postal vehicle operator makes contact with another vehicle or object that is stationary.

b.ii. Not confirmed. Code 600 motor vehicle accidents involve postal vehicles that are in motion.

7.   In Response to CHIR No. 9, the Postal Service stated that to reduce the number of motor vehicle accidents in FY 2018, "[t]he Enterprise Analytics team has begun to design forecasting models related to motor vehicle accidents." *Id.* question 9.a.iii. Please explain the types of forecasting models the Enterprise Analytics team is designing, including data sources and variables that go into these models.

RESPONSE:

The Postal Service must address thousands of accidents every year, which may involve injuries, work days lost, fatalities, and considerable financial costs. Enterprise Analytics, in partnership with many other departments within the Postal Service, investigated road safety over a number of months in FY 2017. Different focuses over those months provided unique views into various aspects of the problem and insights into possible improvements. Many methodologies and tools were also used: database techniques and advanced analytics were the primary emphasis, but geospatial models, meetings with outside experts, interviews with postal employees, return-on-investment technique, and literature reviews also contributed to the depth of the analysis. In addition, research on non-postal motor vehicle accidents informed the prioritization of data sources for analysis. Analysis was presented to postal management on accidents occurring in Alabama, with plans to possibly expand analysis to the other 49 states.

Focus for this FY 2017 research included:

- Route-Related Factors
- Environmental-Related Factors
- Vehicle Related-Factors
- Driver Related-Factors